

Richard E. Leff, Esq. (RL-2123)
McGIVNEY & KLUGER, P.C.
80 Broad Street, 23rd Floor
New York, New York 10004
(212) 509-3456

Attorneys for Defendants:
LEHMAN BROTHERS INC., LEHMAN COMMERCIAL PAPER INC. and LEHMAN
BROTHERS HOLDINGS INC.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X 21 MC 103 (AKH)

FREDDY PINZA,

Index No.: 07-CV-10486

Plaintiff(s),

**NOTICE OF ADOPTION OF ANSWER
TO MASTER COMPLAINT**

-against-

ELECTRONICALLY FILED

THE CITY OF NEW YORK, TULLY
CONSTRUCTION CO., INC., TULLY
ENVIRONMENTAL INC., TULLY
INDUSTRIES, INC., TURNER
CONSTRUCTION COMPANY, BOVIS LEND
LEASE, INC.,

Defendant(s).

-----X

PLEASE TAKE NOTICE that Defendants, LEHMAN BROTHERS INC., LEHMAN
COMMERCIAL PAPER INC. and LEHMAN BROTHERS HOLDINGS INC., by their
attorneys, McGIVNEY & KLUGER, P.C., as and for their Response to the allegations set forth
in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in
the above-referenced action, hereby adopt their Answer to Master Complaint dated August 10,
2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site
Litigation*, 21 MC 103 (AKH).

WHEREFORE, the defendants, LEHMAN BROTHERS INC., LEHMAN
COMMERCIAL PAPER INC. and LEHMAN BROTHERS HOLDINGS INC., by their

attorneys, McGIVNEY & KLUGER, P.C., demand judgment dismissing the above-captioned action as against them, together with their costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
January 10, 2008

Yours etc.,

McGIVNEY & KLUGER, P.C.
Attorneys for Defendants
LEHMAN BROTHERS INC., LEHMAN
COMMERCIAL PAPER INC. and LEHMAN
BROTHERS HOLDINGS INC.

By: 

Richard E. Left (RL-2123)
80 Broad Street, 23rd Floor
New York, New York 10004
(212) 509-3456

TO: OSHMAN & MIRISOLA, LLP
42 Broadway, 10th Floor
New York, New York
10004
(212) 233-2100

All Defense Counsel